

From: **David J. Strachman** <djs@mtlesq.com>
Date: Mon, Nov 15, 2010 at 10:51 AM
Subject: RE: Ungar v. PLO privilege log
To: "Hill, Brian" <BHill@milchev.com>, "Hibey, Richard" <rhibey@milchev.com>, "Rochon, Mark" <mrochon@milchev.com>, "Sherman, Deming" <dsherman@eapdlaw.com>
Cc: Max Wistow <mw@wistbar.com>, Benjamin Ledsham <bledsham@wistbar.com>, "RJT@TolchinLaw.com" <RJT@tolchinlaw.com>

Brian,

- 1) Are you representing, subject to Rule 11, that there were never any written communications between the PA and the "PIF" regarding the relevant topics except via attorneys?
- 2) Are you representing, subject to Rule 11, that there were never any written communications between the PA's and/or its attorneys and the attorneys purporting to represent the PIF, in the two years between the initiation of the Ungars' enforcement proceedings against PIF-titled assets and Miller & Chevalier's retention? Because none are listed in the log.
- 3) Are you prepared to specify exactly what search was undertaken?

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